

WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 7600
OLYMPIA, WASHINGTON 98504

IN THE MATTER OF:

Longview Fibre Paper and Packaging, Inc.]VARIANCE
P.O. Box 639]No. 7370-AQ10
Longview, WA 98632]

RCW 70.94.181 (Variances - Application for - Considerations - Limitations - Renewals - Review.) reads in part: Any person who owns or is in control of any plant, building, structure, establishment, process or equipment may apply to the department of ecology or appropriate local authority board for a variance from rules or regulations governing the quality, nature, duration or extent of discharges of air contaminants. Variance is also addressed in WAC 173-400-180.

On January 29, 2010, Longview Fibre Paper and Packaging, Inc. (LFPP) submitted a request for a variance from the Operating Limits for Recovery Furnace No. 22 (RF22) and Smelt Dissolving Tank No. 22 (SDT22). RF22 and SDT22 work in tandem. Molten material from RF22 is collected in SDT22 as part of the chemical recovery process which allows reuse of chemicals within the mill. The units each have a current operating limit of 1950 TBLS/D (tons of black liquor solids per day). The limits are included in both a Prevention of Significant Deterioration Permit (PSD) 01-03, Second Amendment and an Air Operating Permit (AOP) 000007-8 (see PSD conditions 1.21 and 1.45, and AOP conditions A4.8 and B4.7).

LFPP is in the process of permitting a large project which includes increasing the capacity of RF22 and SDT22. The variance request is to allow a temporary increase to the operating limit to investigate what the actual TBLS/D capacity of RF22/SDT22 is, evaluate the effects of the higher operating rate on installed air pollution control equipment, and for reductions in total emissions compared to operating a second RF/SDT to meet production needs. The request from the company is to allow the increase for a limited period of time, ending on either the date of issuance of permit(s) authorizing a higher production rate in the RF22/SDT22 system or one calendar year after issuance of the variance, whichever occurs earlier. Current emission rate limits in the PSD and AOP permits, such as parts per million and pound/TBLS limits, would remain in effect.

LFPP has investigated two options to allow production at rates approximately 25% in excess of the 1950 TBLS/D operating limit. The first is operating RF22/SDT22 at rates exceeding the currently permitted operating limits. The second is operating both RF22/SDT22 and RF19/SDT19 at slightly over one-half of their permitted operating limits. Granting the variance serves three basic functions:

1. A net reduction in emissions. Operation of RF19/SDT19 results in higher emissions per ton of black liquor solids than operation of RF22/SDT22. Thus, operating RF22/SDT22 at a higher rate results in lower total emissions and lower emissions for all parameters (except particulate matter (PM)) than the combined emissions while operating both RF19/SDT19 and RF22/SDT22 at lower rates. TRS emissions, which are associated with odor, are expected to be reduced by 37 lbs/D by operating as proposed in the variance request. Based on historical operation of both furnaces together, reduced TRS emissions result in lower numbers of odor complaints.

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2. An opportunity to test RF22/SDT22 pollution control equipment at higher rates of operation. The current operating limit is based on a 30-day average. LFPP has operated the unit for short periods of time in excess of the 30-day average limit. During those time periods PM emissions increased suggesting a need to modify pollution control equipment operation and/or size. The variance will allow LFPP to better determine pollution control needs associated with the larger planned project.
3. More efficient mill operation. Operating one unit at a higher rate is more efficient than operating two units at lower rates resulting in an economic benefit.

FINDINGS:

1. Emissions occurring as a result of the variance are not expected to endanger public health or safety or the environment. Emission reductions are expected compared to the alternative of operating RF22/SDT22 and RF19/SDT19 at lower rates. Both LFPP and the public are expected to benefit from the project.
2. The emission reductions, RF22/SDT22 pollution control equipment operational data collection, and economic benefits cannot be realized in a timely manner without this variance. The time period for the variance will be limited to the time period in which a revised limit can be applied for and obtained. The maximum duration of the variance shall be one year.
3. It is in the best interest of LFPP and the local community to issue a variance as requested.

THEREFORE, Ecology approves the variance as requested with the following conditions.

CONDITIONS:

1. LFPP may operate RF22/SDT22 at rates exceeding the operating limit of 1950 TBLS/D (30 day average) specified in PSD 01-03, Second Amendment and AOP 000007-8. The units and all supporting equipment such as black liquor concentrators, pumps, etc., may not be physically modified to increase capacity. All other requirements applicable to RF22/SDT22 remain in effect.
2. LFPP may operate RF22/SDT22 at a rate exceeding 1950 TBLS/D (daily average) only when RF19/SDT19 are not operating.
3. LFPP must conduct PM source tests at least monthly at RF22 and SDT22 for months when the units are operated at least 5-days at rates in excess of 1950 TBLS/D. The source tests must be conducted while the units are operating at a rate approximating the peak operational rate during the month.
4. LFPP must promptly reduce the RF22/SDT22 operating rate to a maximum of 1950 TBLS/D if an exceedence of any emission limit applicable to RF22/SDT22 occurs. Ecology Industrial Section must be notified within 24-hours of such an exceedence. Prior to resuming operation at a rate greater than 1950 TBLS/D, LFPP must explain to Ecology's satisfaction the circumstances of the incident and how future incidents will be prevented.
5. This variance expires when all permit conditions to which the variance applies are modified to reflect new operating limits or one year from the date of issuance, whichever occurs first.

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Ecology may rescind this variance if LFPP does not submit application for a new RF22/SDT22 operating limit in a timely manner.

6. LFPP may not use operating rates achieved under this variance in any PSD applicability analysis for demonstrating production rates that the RF22/SDT22 system are capable of accommodating.

DATED on this ____ day of March 2010, at Olympia, WA.

Merley F. McCall
Industrial Section Supervisor
Waste 2 Resources Program

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